

Tony S. Lee

T 202.344.8065

F 202.344.8300

tslee@venable.com

July 28, 2011

VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: Iowa Wireless Services, LLC; FRN 0002576874¹
E911 Location Accuracy Exclusion List
PS Docket No. 07-114**

Dear Ms. Dortch:

On behalf of Iowa Wireless Services, LLC, d/b/a i wireless ("i wireless"), and as required by Section 20.18(h)(1)(F) of the Commission's Rules, 47 C.F.R. § 20.18(h)(1)(F), and the FCC's *Wireless E911 Second Report and Order*,² transmitted herewith is a blanket "exclusion list" filing covering i wireless and the attached list of rural wireless telecommunications carriers that provide service under the i wireless brand name. A copy of this filing is also being sent to the National Emergency Number Association ("NENA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), and the National Association of State 9-1-1 Administrators ("NASNA").

By way of background, i wireless provides PCS and broadband data services in primarily rural areas in Iowa.³ i wireless has close contractual relationships with small independent telephone companies ("ITCs") throughout Iowa to extend the reach of its network to include remote rural areas. i wireless and the ITCs operate a GSM network, and they utilize a network-

¹ The FRN listed is for Iowa Wireless Services Holding Corporation, which is a wholly owned subsidiary of Iowa Wireless Services, LLC. Iowa Wireless Services Holding Corporation is the entity that holds the FCC licenses on behalf of the company.

² *Wireless E911 Location Accuracy Requirements*, Second Report and Order, 25 FCC Rcd 18909 (2010) ("*Wireless E911 Second Report and Order*").

³ i wireless and its brand-partners also provide service in small limited areas in states adjacent to Iowa.

Marlene H. Dortch, Secretary

July 28, 2011


Page 2

based solution to meet the Commission's wireless handset location requirements. i wireless has assumed primary responsibility on behalf of the ITCs to prepare this blanket filing, which lists the counties for i wireless and the ITCs that are excluded from the handset accuracy requirements set forth in Section 20.18 of the Commission's rules. The ITC entity and county exclusion information is attached hereto as Exhibit A.

In i wireless's filing, the company lists either entire counties, or portion of counties, that it is excluding from the FCC's accuracy requirements. Those areas are being excluded due to an insufficient quantity of cell sites, insufficient density of cell sites, or insufficient cell site geometry, in order to perform E911 handset location that meets the new accuracy standards. i wireless will submit supplemental filings as needed, and in accordance with the FCC's rules, as the company continues to expand and upgrade its network.

Should you have any questions with respect to this matter, please feel free to contact the undersigned.

Respectfully submitted,



Tony S. Lee

Counsel for Iowa Wireless Services, LLC

Enclosure

cc: David Siehl (FCC, Public Safety and Homeland Security Bureau)
NENA
APCO
NASNA

List of ITCs* Covered by i wireless's Blanket Exclusion Filing

FRN	IWS Consortium**	FRN	IWS Partner
0004770434	Carroll County Wireless, LLC	0002594752	Marne & Elk Horn Telephone Co.
0002591774	Breda Telephone Corporation	0002574861	Bernard Communications, Inc..
0003757374	Arcadia Telephone Cooperative	0004194585	Dixon Telephone Co.
0003724705	Templeton Telephone Company	0002595874	Goldfield Telephone Company (North Central Wireless)
0002576833	Cedar County Wireless, LLP (listed as: Cedar County PCS L.L.C.)	0004193983	LaMotte Telephone Company Inc.
0003772787	Clarence Telephone Company	0002588333	Swisher Telephone Company
0003748340	Mechanicsville Telephone Co (also FRN 0003766284)	0002588192	Cooperative Telephone Company
0004770475	Community Digital Wireless	0002587863	South Slope Wireless
0002594893	Northeast Iowa Telephone Co.	0002592061	Minerva Valley Telephone Co., Inc.
0002557627	East Buchanan Telephone Coop	0002594315	Montezuma Mutual Telephone Co. (listed as Windstream Montezuma, Inc.
0002595734	Hawkeye Telephone Co.	0002588051	Modern Coop. Telephone Co.
0002594067	Oran Mutual Telephone Company	0002589307	Webster-Calhoun Coop. Telephone Assn.
0002593655	Readlyn Telephone Co.	0002575561	DC Communications
0004794996	Fibercomm LC	0002588606	Center Junction Tel. Co. Inc.
0002592285	CML Telephone Cooperative Assn.	0002592517	Corn Belt Telephone Company
0005097175	Hill Telephone Company, Inc.	0002590586	Onslow Coop. Telephone Assn.
0002587707	Hospers Telephone Company (also FRN 0018596965)	0002589778	Miller Telephone Company
0002594190	Mutual Telephone Company	0002593481	Sac County Mutual Telephone Co.
0002595858	Northern Iowa Telephone Company	0002557742	Ventura Telephone Co. Inc.
0002593986	Peoples Telephone Company	0002592509	Radcliffe Telephone Co., Inc.
0002592392	West Iowa Telephone Company	0002592921	Stratford Mutual Telephone Co.
0002590073	Western Iowa Telephone Assn	0002588192	Cooperative Telephone Company
0004192795	FWC Communications	0002598464	Brooklyn Mutual Telephone Co.
0002590057	Winnebago Coop. Telephone Assn.	0004194361	Olin Telephone Co., Inc.
0002598209	Clear Lake Independent Tele. Co.	0002589281	Baldwin -Nashville Telephone Co.
0003722790	Farmers Mutual Tele Co. - Nora Springs	0002594778	Ogden Telephone Company
0004770525	PST Digital, LLC	0002595452	Dumont Telephone Company
0002594026	Pella Cooperative Electric Association	0002587491	Andrew Telephone Company
0002592897	Sully Telephone Association	0002593440	Schaller Telephone Co.
0004197828	The Guthrie Group	0005669668	Barnes City Cooperative Tele. Co.
0004192639	Casey Cable Company	0002598076	Scranton Telephone Company
0003749181	Coon Valley Cellular	0002580082	Lehigh Valley Cooperative Telephone
0002575777	Panora Coop. Tele. Assn. Inc.	0002588655	Wilton Telephone Company
0003767894	Prairie Telephone Co. Inc.	0011496445	Evertex Incorporated
0002576858	Wapsi Wireless	0002576353	Rolling Hills Communications Inc.
0011397759	Cascade		Interstate Communications (no FRN available)
0003773827	Lost Nation-Elwood Telephone Co.	0011431269	Cedar-Wapsi Communications
0002577237	CST Communications, Inc.	0002576791	MAC Wireless
0003726759	Farmers & Businessmen's Tele Co.	0003722121	Central Scott Telephone
0003748084	Grand Mound Coop. Telephone Assn.	0014663744	CCM Wireless (Colo Telephone Co.)
0003748589	Preston Telephone Company	0004770509	Southeast Wireless
0003734951	Miles Coop. Telephone Assn.	0002557627	East Buchanan Telephone
0004770566	Washington County PCS Consortium	0002576742	FMTc Wireless, Inc. d/b/a OmniTel Wireless
0002591154	Kalona Co-op Telephone Company	0004197844	Hardin County Wireless
0006765291	SEI Wireless	0002576767	Central Iowa Wireless (Jefferson)
0004194270	Sharon Telephone Co.	0004193983	Mill Valley Wireless (listed as: LaMotte Tel. Co.)
0002592426	Wellman Coop. Telephone Assn.	0002594125	Communications 1 Network, Inc.
0014138598	Skylink, LC	0015491459	Clay County Communications
0005671128	Algona Municipal Utilities	0014045504	Van Buren Wireless
0003749587	Titonka Burt Telephone Company	0016136962	Hamilton County Wireless
0003748506	Palmer Mutual Telephone Co.	0003722758	Terril Telephone Company
0002576452	Northwest Iowa Telephone Company	0002432672	Alliance Communicatons Coop
0002594976	Lone Rock Coop. Telephone Co.	0002561884	Spencer Municipal Utilities
0002596195	Fenton Coop. Tele. Co.	0003741964	Rockwell Cooperative Telephone Associatino
0002835569	Ruthven LLD., Inc.	0002428175	Golden West SD (listed as: GW Wireless, Inc.)
0017602756	LAW (Lakes Area Wireless)	0006035513	Airwave Wireless, LLC
0003734449	Ringsted Communications Co. Inc.	0002595734	Hawkeye Telephone
0003722758	Terril Telephone Cooperative	0003722840	Minburn Communications
0003730959	River Valley Telephone Coop. (also FRN 0005669791)		
0016864878	Premier Wireless, Inc.		
* The companies listed herein may have additional subsidiaries or operations doing business under an assumed or brand name. This filing is intended to also cover those entities.			
**The members of each consortium are listed under the consortium name.			

County ExclusionList

County FIPS	Counties	State	Exclusion Type	Reason for Exclusion	Partial Exclusion Description
19001	Adair	IA	Whole	1	
19003	Adams	IA	Whole	1	
19005	Allamakee	IA	Whole	1	
19007	Appanoose	IA	Whole	1	
19009	Audubon	IA	Whole	1	
19011	Benton	IA	Whole	1	
19013	Black Hawk	IA	Partial	1	All Except N of US20 to W Airline Hwy and E of Hudson Rd to N Elk Run Rd
19015	Boone	IA	Whole	1	
19017	Bremer	IA	Whole	1	
19019	Buchanan	IA	Whole	1	
19021	Buena Vista	IA	Whole	1	
19023	Butler	IA	Whole	1	
19025	Calhoun	IA	Whole	1	
19027	Carroll	IA	Whole	1	
19029	Cass	IA	Whole	1	
19031	Cedar	IA	Whole	1	
19033	Cerro Gordo	IA	Partial	1	All Except S of intersection of US65 and 12th St NW to US65 and 8th St, and E of intersection of SR122 and Olive Ave to SR122 and Carolina Ave
19035	Cherokee	IA	Whole	1	
19037	Chickasaw	IA	Whole	1	
19039	Clarke	IA	Whole	1	
19041	Clay	IA	Whole	1	
19043	Clayton	IA	Whole	1	
19045	Clinton	IA	Partial	1	All Except NW of US30/US67 to Mill Creek Pkwy and 13th Ave N
19047	Crawford	IA	Whole	1	
19049	Dallas	IA	Whole	1	
19051	Davis	IA	Whole	1	
19055	Delaware	IA	Whole	1	
19057	Des Moines	IA	Partial	1	All Except S of US34 to Mason Rd and E of US61
19059	Dickinson	IA	Partial	1	All Except S of SR-9/US-71 to Linden Dr and W of CR-M56 to SR-86
19061	Dubuque	IA	Partial	1	All Except N of US20 to S of CR-Y14 and W of US52 to E of SR32
19063	Emmet	IA	Whole	1	

County ExclusionList

County FIPS	Counties	State	Exclusion Type	Reason for Exclusion	Partial Exclusion Description
19065	Fayette	IA	Whole	1	
19067	Floyd	IA	Whole	1	
19069	Franklin	IA	Whole	1	
19073	Greene	IA	Whole	1	
19075	Grundy	IA	Whole	1	
19077	Guthrie	IA	Whole	1	
19079	Hamilton	IA	Whole	1	
19081	Hancock	IA	Whole	1	
19083	Hardin	IA	Whole	1	
19085	Harrison	IA	Whole	1	
19087	Henry	IA	Whole	1	
19089	Howard	IA	Whole	1	
19091	Humboldt	IA	Whole	1	
19093	Ida	IA	Whole	1	
19095	Iowa	IA	Whole	1	
19097	Jackson	IA	Whole	1	
19099	Jasper	IA	Whole	1	
19101	Jefferson	IA	Whole	1	
19103	Johnson	IA	Partial	1	All Except S of I-80 to SR1/US6 and E of US218 to Scott Blvd
19105	Jones	IA	Whole	1	
19107	Keokuk	IA	Whole	1	
19109	Kossuth	IA	Whole	1	
19111	Lee	IA	Whole	1	
19113	Linn	IA	Partial	1	All Except S of Boyson Rd to US151 and E of Edgewood Rd to E Post Rd
19115	Louisa	IA	Whole	1	
19117	Lucas	IA	Whole	1	
19119	Lyon	IA	Whole	1	
19121	Madison	IA	Whole	1	
19123	Mahaska	IA	Whole	1	
19125	Marion	IA	Whole	1	
19127	Marshall	IA	Partial	1	All Except N of US30 to 170th St and W of SR14 to SR330
19129	Mills	IA	Whole	1	
19131	Mitchell	IA	Whole	1	
19133	Monona	IA	Whole	1	

County ExclusionList

County FIPS	Counties	State	Exclusion Type	Reason for Exclusion	Partial Exclusion Description
19135	Monroe	IA	Whole	1	
19137	Montgomery	IA	Whole	1	
19139	Muscatine	IA	Partial	1	All Except E of US61 and W of SR22 and NW of SR92
19141	O'Brien	IA	Whole	1	
19143	Osceola	IA	Whole	1	
19145	Page	IA	Whole	1	
19147	Palo Alto	IA	Whole	1	
19149	Plymouth	IA	Whole	1	
19151	Pocahontas	IA	Whole	1	
19153	Polk	IA	Whole	1	
19155	Pottawattamie	IA	Whole	1	
19157	Poweshiek	IA	Whole	1	
19159	Ringgold	IA	Whole	1	
19161	Sac	IA	Whole	1	
19163	Scott	IA	Partial	1	All Except S of I-80 and E of I-280
19165	Shelby	IA	Whole	1	
19167	Sioux	IA	Whole	1	
19169	Story	IA	Whole	1	
19171	Tama	IA	Whole	1	
19173	Taylor	IA	Whole	1	
19175	Union	IA	Whole	1	
19177	Van Buren	IA	Whole	1	
19179	Wapello	IA	Partial	1	All Except N of Mary St to W Park Ave and E of CR-H31/US34 to intersection of US34 and N Quincy Ave
19181	Warren	IA	Whole	1	
19183	Washington	IA	Whole	1	
19185	Wayne	IA	Whole	1	
19187	Webster	IA	Whole	1	
19189	Winnebago	IA	Whole	1	
19191	Winneshiek	IA	Whole	1	
19193	Woodbury	IA	Partial	1	All Except N of US20 to 28th St/Military Rd and W of US20/US75 to SR-12
19195	Worth	IA	Whole	1	
19197	Wright	IA	Whole	1	
17067	Hancock	IL	Whole	1	

County ExclusionList

County FIPS	Counties	State	Exclusion Type	Reason for Exclusion	Partial Exclusion Description
17071	Henderson	IL	Whole	1	
17073	Henry	IL	Whole	1	
17085	Jo Daviess	IL	Whole	1	
17131	Mercer	IL	Whole	1	
17161	Rock Island	IL	Partial	1	All Except N of I-280 and W of I-80
17195	Whiteside	IL	Whole	1	
31043	Dakota	NE	Whole	1	
46015	Brule	SD	Whole	1	
46019	Butte	SD	Whole	1	
46081	Lawrence	SD	Whole	1	
46085	Lyman	SD	Whole	1	
46093	Meade	SD	Whole	1	
46103	Pennington	SD	Whole	1	
46127	Union	SD	Whole	1	

Category Reason for Exclusion

1 Insufficient quantity, density, and/or geometry of cell sites in the area to support network-based triangulation

AFFIDAVIT

I, Michael S. Haskins, hereby attest to the following:

1. My name is Michael S. Haskins, and I am the Chief Operating Officer of Iowa Wireless Services Holding Corporation d/b/a i wireless. My business address and telephone number is 4135 N. W. Urbandale Drive, Urbandale, IA 50322, (515) 258-7000.

2. i wireless provides PCS and broadband data services in primarily rural areas in Iowa, and also in small limited areas in states adjacent to Iowa. i wireless has close contractual relationships with small independent telephone companies ("ITCs") throughout Iowa to extend the reach of its network to include remote rural areas. i wireless and the ITCs operate a GSM network, and they utilize a network-based solution to meet the Commission's wireless handset location requirements. i wireless has assumed primary responsibility on behalf of the ITCs to prepare a blanket filing listing the counties that i wireless and the ITCs are excluding from the handset accuracy requirements set forth in Section 20.18 of the Commission's rules. I have directed appropriate i wireless personnel to create the ITC entity and county exclusion information to the blanket filing as Exhibit A.

3. I have read the foregoing documents, and based on information provided to me by i wireless personnel, I believe that they are true and correct. i wireless will submit supplemental filings as needed, and in accordance with the FCC's rules, as the company continues to expand and upgrade its network.



Michael S. Haskins
Chief Operating Officer
Iowa Wireless Services Holding Corporation

Date: July 28, 2011